

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MARY DESMOND, THOMAS ZIOBROWSKI,
PAUL WATTS on their own behalf and on behalf
of other participants in the defendant ERISA
Plans

Plaintiff,

v.

MORTON C. BATT, ANTHONY L. SCIALABBA,
CITISTREET, LLC, WHITE AND WILLIAMS, LLP,
SCIALABBA & MORRISON, P.C., ANTHONY L.
SCIALABBA & ASSOCIATES, P.C., THE
STANDARD AUTOMOTIVE 401(K) PLAN, THE
STANDARD AUTOMOTIVE EMPLOYER
CONTRIBUTION PLAN,

Defendants.

C.A. No. 05-cv-10355 NG

CERTIFICATION

And now this 20th day of June 2005, in accordance with the Order entered on
May 12, 2005, White and Williams LLP, by its authorized representative, and its
undersigned counsel, certify that they have conferred (a) with a view to establishing a
budget for the costs of conducting the full course, and various alternative courses, of the
litigation of this action, and (b) to consider the resolution of the litigation through the use
of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

WHITE AND WILLIAMS LLP

/s/ Michael Kassak
Michael Kassak, Partner

WHITE AND WILLIAMS LLP

By its Attorney,

/s/ Michael F. Kraemer

Michael F. Kraemer (#657156)
HINCKLEY, ALLEN & SNYDER LLP
1500 Fleet Center
Providence, RI 02903
(401) 274-2000

Dated: June 20, 2005

CERTIFICATE OF SERVICE

I, Michael F. Kraemer, served a copy of the foregoing document on those parties whose counsel have registered with the Court's EFC service by employing such service for filing this document and upon pro se defendant Morton C. Batt on June 20, 2005 by mailing a copy to:

Morton C. Batt
2424 NW 63rd Street
Boca Raton, FL 33496-3626

/s/ Michael F. Kraemer

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